



February 11, 2025

VIA ECF

The Honorable Laura Taylor Swain, U.S.D.J.
 Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007

MEMO ENDORSED

Re: United States v. Eric Santana, 1:24-cr-00479-LTS

Dear Judge Swain:

On behalf of Eric Santana, I write to request that Mr. Santana's conditions of pretrial release be modified to enable him to celebrate his son's second birthday with family and friends on February 17, 2025, from 4 p.m. to 9 p.m. at Sky Zone, a trampoline park.

Mr. Santana was arrested on August 6, 2024, and placed on pretrial release with home detention. Pretrial Services has advised that he has remained in compliance with his conditions of release during the more than six months he has been on pretrial release. Pretrial Services has further advised that it does not approve social events for defendants on home detention, and thus Pretrial does not consent to this request for that reason.¹ The Government takes no position on this request. Since Mr. Santana has demonstrated a willingness to comply with the terms of supervision, the defense respectfully requests that the Court grant this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Kristen M. Santillo

Kristen M. Santillo

cc: AUSA Getzel Berger
 Pretrial Services Officer Ashley Cosme

The foregoing request is granted. Mr. Santana will be permitted to leave his house at the date and time outlined above to accompany his child on the described outing, provided that he gives any requested information about the outing to his pretrial services officer. This resolves docket entry no. 44. SO ORDERED.

Dated: February 11, 2025
 /s/ Laura Taylor Swain, Chief U.S.D.J.

¹ Pretrial Services has noted that Mr. Santana has not secured employment, but the defense notes that Mr. Santana is the primary caregiver for his toddler, which is a challenging job for anyone. His conditions of home detention also limit his ability to search for jobs that are not posted online, making it difficult for him to find flexible work that allows him to also care for his son.